

Jon A. Wilson  
Brett C. Jensen  
BROWN LAW FIRM, P.C.  
315 North 24<sup>th</sup> Street  
P.O. Drawer 849  
Billings, MT 59103-0849  
Tel. (406) 248-2611  
Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*)

MILLER MCNAMARA & TAYLOR LLP  
100 South Bedford Road, Suite 340  
Mount Kisco, New York 10549  
Tel./E-Fax (845) 288-0844

*Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA } Cause No. CV 20-52-BLG-SPW  
MAPLEY, }  
Plaintiffs, }  
vs. }  
WATCHTOWER BIBLE AND }  
TRACT SOCIETY OF NEW YORK, }  
INC., WATCH TOWER BIBLE AND }  
TRACT SOCIETY OF }  
PENNSYLVANIA, and BRUCE }  
MAPLEY SR., }  
Defendants. }

**DEFENDANT WATCHTOWER  
BIBLE AND TRACT SOCIETY OF  
NEW YORK, INC.'S UNOPPOSED  
MOTION FOR ATTORNEY JOEL  
M. TAYLOR TO APPEAR  
REMOTELY AT HEARING ON  
PLAINTIFFS' MOTION TO  
COMPEL (DOC. 132)**

WATCHTOWER BIBLE AND )  
TRACT SOCIETY OF NEW YORK, )  
INC. )  
Cross-Claimant, )  
vs. )  
BRUCE MAPLEY SR., )  
Cross-Claim Defendant.

---

COMES NOW Defendant Watchtower Bible and Tract Society of New York, Inc. (hereinafter “WTNY”), by and through its attorneys, and respectfully moves for its *pro hac vice* counsel Joel M. Taylor to appear remotely at the hearing on Plaintiffs’ Motion to Compel (Doc. 132), scheduled for Friday, October 21, 2022, at 9:30 a.m. Counsel for WTNY has contacted counsel for the other parties and this Motion is Unopposed. A proposed Order is enclosed for the Court’s consideration and convenience.

DATED this 18<sup>th</sup> day of October, 2022.

By: /s/ Jon A. Wilson  
Jon A. Wilson  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendant Watchtower  
Bible and Tract Society of New York,  
Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 18, 2022, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepans/Ryan R. Shaffer/James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
Missoula, MT 59802
3. Matthew L. Merrill (appearing *pro hac vice*)  
MERRILL LAW, LLC  
1863 Wazee Street, Suite 3A  
Denver, CO 80202
4. Gerry P. Fagan/Christopher T. Sweeney/Jordan W. Fitzgerald  
MOULTON BELLINGHAM PC  
P.O. Box 2559  
Billings, MT 59103-2559
5. Bruce G. Mapley Sr.  
3905 Caylan Cove  
Birmingham, AL 35215

by the following means:

<u>1-4</u>	CM/ECF	<u>Fax</u>
	Hand Delivery	<u>E-Mail</u>
<u>5</u>	U.S. Mail	<u>Overnight Delivery Services</u>

By: /s/ Jon A. Wilson  
Jon A. Wilson  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendant Watchtower  
Bible and Tract Society of New York,  
Inc.*